

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SARAH R. LONDON  
IN SUPPORT OF PLAINTIFFS' PORTION  
OF PTO 8 LETTER BRIEF REGARDING  
REDACTIONS**

This Document Relates to:

Judge: Honorable Lisa J. Cisneros

All Cases

1 I, Sarah R. London, hereby declare as follows:

2 1. I am a partner of Lieff Cabraser Heimann & Bernstein, LLP, an attorney licensed  
3 in the State of California and duly admitted to practice before this Court, and appointed co-lead  
4 counsel in the above captioned action.

5 2. I submit this declaration in support of Plaintiffs' portion of the joint letter brief  
6 concerning Uber's redactions of documents produced under PTO 5.

7 3. I have personal knowledge of the facts stated herein and, if called upon to do so,  
8 could and would testify competently thereto.

9 4. As required by PTO 8, I attest that Plaintiffs met and conferred with Defendants to  
10 obtain the sought-after discovery without court action.

11 5. Attached as **Exhibit A** is a true and correct copy of a document Uber produced  
12 under PTO 5 with a bates stamp beginning UBER-MDL3084-000001290. Because Uber marked  
13 this document Confidential, it has been filed under seal.

14 6. Attached as **Exhibit B** is a true and correct copy of a document Uber produced  
15 under PTO 5 bates-stamped UBER-MDL3084-000048774. Because Uber marked this document  
16 Highly Confidential, it has been filed under seal.

17 7. Attached as **Exhibit C** is a true and correct copy of a document Uber produced  
18 under PTO 5 bates-stamped UBER-MDL3084-000033294. Because Uber marked this document  
19 Highly Confidential, it has been filed under seal.

20 8. Attached as **Exhibit D** is a true and correct copy of a document Uber produced  
21 under PTO 5 with a bates stamp beginning UBER-MDL3084-000032853. Because Uber marked  
22 this document Highly Confidential, it has been filed under seal.

23 9. Attached as **Exhibit E** is a true and correct copy of a document Uber produced  
24 under PTO 5 bates-stamped UBER-MDL3084-000034701. Because Uber marked this document  
25 Highly Confidential, it has been filed under seal.

26 10. Attached as **Exhibit F** is a true and correct copy of a document Uber produced  
27 under PTO 5 bates-stamped UBER-MDL3084-000004053. Because Uber marked this document  
28 Highly Confidential, it has been filed under seal.

11. Attached as **Exhibit G** is a true and correct copy of a document Uber produced under PTO 5 bates-stamped UBER-MDL-3084-000055512. Because Uber marked this document Highly Confidential, it has been filed under seal.

12. Attached as **Exhibit H** is a true and correct copy of a document Uber produced under PTO 5 bates-stamped UBER-MDL3084-000048716. Because Uber marked this document Highly Confidential, it has been filed under seal.

13. Attached as **Exhibit I** is a true and correct copy of a document Uber produced under PTO 5 bates-stamped UBER-MDL3084-000018830. Because Uber marked this document Highly Confidential, it has been filed under seal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 30th day of July 2024 in San Francisco, California.

/s/ Sarah R. London  
Sarah R. London